

Best Western PLUS®

Park Hotel Pordenone

CODE OF ETHICS

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Best Western PLUS

Park Hotel Pordenone
Via Giuseppe Mazzini 43, 33170 Pordenone, Italy
www.parkhotelpordenone.it
Each Best Western® branded hotel is independently owned and operated

Introduction

This Code of Ethics governs the business activities of Laguna S.a.s. di M.L. Bonacini & C. (the *Company*) and its dealings with third parties. The *Company* has its registered office at Via Giuseppe Mazzini 43, 33170 Pordenone, Italy, and its VAT and tax identification number is IT01327620934.

In addition to complying with applicable laws and regulations, the *Company* is committed to high ethical standards in its day-to-day work. This *Code* of Ethics (the *Code*) sets out those standards and the principles behind them.

The *Code* supplements applicable laws and regulations. The *Company* believes that its business decisions and the conduct of its *Personnel* should follow ethical principles even where specific rules do not exist.

Personnel means everyone who works for or on behalf of the *Company*, including employees, directors, and other contributors such as regular or occasional contractors and independent professionals.

Stakeholders are parties with direct or wider interests that may be relevant to this *Code*.

The *Code* sets out the ethical commitments and responsibilities of everyone who contributes to the *Company*'s objectives in any capacity. These commitments and responsibilities are owed to equity holders, employees, contractors, external advisers, suppliers, customers and others with an interest in the *Company*'s activities.

The *Company* makes the *Code* available to customers, suppliers and other third parties it deals with. In particular, it brings the *Code* to the attention of third parties it engages or has an ongoing relationship with, including through electronic channels or its website, and asks them to observe its principles and standards of conduct in their dealings with the *Company*.

The *Code* is also communicated to all *Personnel* through the same channels or by direct distribution.

Standards of Conduct for the Company

The *Company* regards the following principles as fundamental and undertakes to uphold them in all its dealings.

Compliance with Laws and Regulations

The *Company* complies strictly with the law and takes steps to ensure that all *Personnel* do the same. *Personnel* must act lawfully whatever the circumstances or nature of their work. The same commitment applies to advisers, suppliers, customers and anyone else who deals with the *Company*.

Integrity in Business Conduct

The *Company* is committed to providing quality services and competing freely, fairly and transparently, while dealing fairly with public institutions, government and administrative bodies, members of the public and other businesses.

Non-Discrimination

In decisions affecting its relationships with *Stakeholders*, including customer selection, relations with equity holders, personnel management, work organisation, supplier selection and management, and dealings with the local community and its representative institutions, the *Company* respects human rights and upholds fairness, sustainability and inclusion. It rejects discrimination on grounds of age, sex, sexuality, health status, race, nationality, political opinions or religious beliefs. The same principles apply to recruitment and dealings with *Personnel*.

Valuing Personnel

The *Company* manages its people with respect for each individual and their professional contribution, safeguarding their physical and moral integrity. *Personnel* must treat everyone they encounter on the *Company*'s behalf fairly, respectfully and with dignity. The *Company* rejects all forms of forced labour, unlawful employment and work by children under 14. It does not tolerate human rights violations.

Fair Exercise of Authority

Where contractual relationships involve a reporting hierarchy, the *Company* is committed to ensuring that authority is exercised fairly and properly and that all forms of abuse are avoided. The same principles apply to decisions on how work is organised.

Health, Safety and the Environment

The *Company* aims to operate in a socially responsible and environmentally sustainable manner by implementing an environmental management system covering waste generation, energy use and production, water use and carbon dioxide emissions. The *Company* also takes care to provide accurate and truthful information about its activities.

Unethical Conduct

Any individual or organisation that uses a position of power to unfairly benefit from the efforts of others acts unethically and risks fostering hostility towards the *Company*.

Fair Dealing in Contracts

Contracts and work assignments must be carried out on the terms knowingly agreed by the parties. The *Company* undertakes to refrain from taking advantage of another party's lack of knowledge or capacity.

Fair Competition

The *Company* is committed to fair competition and refrains from collusive or predatory conduct and abuse of market position. Anyone working with the *Company* in any capacity must refrain from taking part in agreements that breach rules on free competition between businesses, subject to the provisions on agreements, arrangements or similar instruments based on objective criteria.

Supporting Local Communities

The *Company* supports the communities in which it operates by committing to source most of its purchases from local suppliers and by giving priority to local applicants when recruiting.

Transparent and Complete Information

When drafting contracts or other rules governing dealings with third parties, the *Company* ensures that the relevant terms are clear and easy to understand.

Personal Data Protection

The *Company* collects and processes personal data relating to customers, contractors, workers and others, including individuals and legal entities. This includes any information that can identify a person directly or indirectly and may include sensitive data revealing, for example, racial or ethnic origin or health status.

The *Company* processes such data within the limits of applicable privacy rules and in accordance with Italian legislation and its annexes, requirements issued by the Italian Data Protection Authority, and applicable European legislation or directives. *Personnel* who handle data in the course of their work, including sensitive data, must always comply with these rules and the operating instructions they receive. The *Company* promotes awareness of data protection among its *Personnel*.

Standards of Conduct for Personnel

Company Personnel must observe the following principles in their dealings with the *Company*.

Professionalism

Personnel must carry out their work diligently, efficiently and fairly, make the best use of the resources and time available to them, and take responsibility for fulfilling their duties.

Loyalty

Personnel must act loyally towards the *Company*.

Honesty

Personnel must be familiar with the *Company*'s organisational model and applicable laws and follow them diligently in their work. Pursuing

the *Company*'s interests can never justify dishonest or unlawful conduct.

Proper Conduct

Personnel may use information, property and equipment available to them through their roles or assignments for personal purposes only to the extent authorised. They must refrain from putting pressure on anyone or making or accepting recommendations or referrals, on their own or anyone else's behalf, where doing so could harm the *Company* or confer an improper advantage on themselves, the *Company* or a third party. They must reject any promise of an improper payment or other benefit and refrain from making such promises themselves.

Respect

Personnel must be friendly and respectful and use courteous, professional language. They must avoid conduct or comments that could offend others or damage the Company's reputation.

Confidentiality

Personnel must treat information belonging to the *Company* or relating to its activities as strictly confidential and comply with applicable laws, regulations and internal procedures. They may use confidential information only for purposes connected with their work.

Resolving Conflicts of Interest

Personnel must promptly inform their manager or designated contact of any situation or activity in which their interests or those of a close relative could conflict with the *Company*'s interests, or where other substantial reasons make disclosure appropriate. *Personnel* must abide by the *Company*'s decisions on the matter.

Rules of Conduct

Relations with *Personnel* and contractors.

Recruitment

Candidates are assessed against the requirements of the role and the needs of the *Company*, in line with applicable law and with equal opportunity for all applicants. The *Company* requests only information needed to assess professional qualifications and aptitude for the role, and respects candidates' privacy and opinions. It takes steps to prevent favouritism and preferential treatment in recruitment.

Entering into Employment

Personnel are hired under a duly executed employment contract or another legally permitted arrangement. The Company does not tolerate unlawful employment. On starting work, each person receives detailed information on the following:

- the applicable employment terms and pay
- the nature of the role and the duties involved
- the information and training needed to perform those duties
- the rules and procedures to follow to prevent work-related health risks
- the technical and professional training required by law.

Managing *Personnel*

The *Company* protects each person's moral integrity and guarantees the right to working conditions that respect their dignity. Everyone must be treated with equal respect and dignity and have the same opportunities for professional development and career progression. The *Company* avoids all forms of discrimination against its *Personnel*. Roles and assignments are allocated on the basis of skills and abilities. Assessments draw on input from managers, Human Resources and, where possible, others who have worked with the person being assessed.

Dignity and Protection at Work

The *Company* protects workers from violence, including psychological violence, and takes action against discriminatory attitudes and conduct. Individuals must be assessed fairly on their achievement of personal objectives.

The *Company* considers all acts of workplace harassment or violence unacceptable and is committed to taking appropriate action against anyone responsible.

Harassment and violence are defined as follows:

- Harassment occurs when one or more people are repeatedly and deliberately subjected to abuse, threats or humiliation at work.
- Violence occurs when one or more people are assaulted at work.

Harassment or violence may be committed by one or more managers or workers. It may have the purpose or effect of violating a person's dignity, harming their health or creating a hostile working environment.

Everyone at the Company has a duty to help maintain a workplace where each person's dignity is respected and working relationships are based on equality and mutual fairness. Anyone who becomes aware of discrimination must report it immediately to their manager or designated contact and can do so without fear of retaliation.

Differences in treatment do not constitute discrimination if they are or can be justified on objective grounds. Differences in pay or grade for similar duties are not considered discriminatory.

Personnel Development and Training

Managers make full use of the expertise available across the Company and support professional development through measures such as pairing people with experienced colleagues, giving them opportunities to prepare for roles with greater responsibility, and providing training courses. Training is assigned to groups or individuals according to their professional development needs. Where optional online training is available through webinars, individuals may take part outside normal working hours according to their interests.

Managing Working Time

Managers must make good use of people's working time by assigning work that fits their duties and the Company's work plans. It is an abuse of authority for managers to use their position to demand services, personal favours or any other conduct that breaches this *Code*.

Personnel Involvement

Where possible, the *Company* involves *Personnel* in how work is carried out and gives them opportunities to take part in discussions and decisions that help achieve the *Company*'s objectives.

Health and Safety

The *Company* is committed to providing a workplace that protects the health and safety of its Personnel and to building a strong safety culture. It raises awareness of workplace risks, encourages responsible behaviour and takes preventive action to protect workers, contractors and third parties.

Everyone must follow internal rules and procedures on risk prevention and health and safety and promptly report any shortcomings or breaches of applicable rules.

The Company pays particular attention to training and communication on workplace health and safety risks and the measures in place to address them.

Privacy

The *Company* processes the personal data of its *Personnel* in accordance with applicable national and European laws and regulations. Each person receives a privacy notice explaining why and how their data is processed, who may receive it and how to exercise their right of access. The *Company* asks for consent where the law requires it. It does not investigate the views, preferences, personal tastes or private lives of employees or contractors. The *Company* may monitor the use of its equipment and resources in accordance with applicable law.

Duties of *Personnel*

General Principles

Personnel must act loyally, honour their employment contracts, comply with this *Code* and carry out the work required of them.

Information Management

Personnel must understand and follow the Company's information security policies to protect the integrity, confidentiality and availability of information. They must prepare clear, objective and comprehensive documents that colleagues, managers or authorised external parties can review when needed.

Confidential Company Information

Company information and know-how must be treated as strictly confidential. Anyone who lacks express authority to answer questions or provide materials requested by internal or external parties must consult the designated contacts and follow their instructions. When dealing with significant, confidential or financial matters, Personnel must take precautions appropriate to the nature of the information. During and after their employment, individuals may use confidential data in their possession solely in the *Company*'s interests. They must never use it for their own benefit or that of a third party.

Confidential Information about Third Parties

Personnel must never obtain confidential information about other businesses or organisations by unlawful means. Anyone who learns confidential information about another party in the course of a contractual relationship may use it only for the purposes permitted under that relationship.

Conflicts of Interest

All *Personnel* must avoid situations that could give rise to a conflict of interest and must refrain from taking personal advantage of business opportunities they learn about in the course of their duties. They must report even an apparent conflict of interest to their designated contact.

Improper Payments, Gifts and Entertainment Expenses

Personnel must neither accept nor receive any gift, gratuity or other token that could influence their actions in the course of their duties. Using a third party to circumvent this rule is prohibited.
Gifts of modest value, such as Christmas gifts, are permitted. Personnel who receive any other gift or benefit must report it to their designated contact so that appropriate action can be taken, including communicating the *Company*'s policy to third parties where necessary.

Use of Company Property

Personnel must take due care to protect Company property, use it responsibly and in line with the operating procedures governing its use, and keep accurate records of how it is used.

Everyone must:

- take proper care when using property entrusted to them
- avoid any misuse of *Company* property that could cause damage, reduce efficiency or otherwise go against the *Company*'s interests
- safeguard the resources entrusted to them and promptly notify the relevant teams of any threats or incidents that could harm the *Company*
- use *Company* equipment in accordance with *Company* instructions and, as a general rule, for business purposes.

When using software and IT devices, everyone must:

- follow the Company's security policies to protect the operation and security of its IT systems
- use email and messaging services such as WhatsApp and SMS only for messages directly related to work
- get express permission before installing any application on a *Company* device
- avoid websites with indecent or offensive content, as well as sites unrelated to their work
- avoid using *Company* applications on personal devices
- use *Company* equipment in accordance with *Company* instructions and, as a general rule, for business purposes.

The *Company* reserves the right to prevent misuse of its property and infrastructure by using monitoring, risk assessment and prevention systems in accordance with applicable law.

Involvement in Antisocial or Criminal Activity

The *Company* rejects all forms of antisocial and criminal activity and is firmly committed to taking no part in them. *Personnel* must have no dealings of any kind with organisations or individuals involved in antisocial or criminal activity that threatens the *Company* or members of the public. In the face of extortion demands from such parties, *Personnel* must refuse any compromise and refrain from making payments or providing anything else demanded. The *Company* also rejects any unlawful activity involving pornography, and in particular child sexual abuse material. *Personnel* must immediately report any such activity or request to their designated contacts so they can consult senior management.

Customer Relations

Impartiality

The *Company* is committed to treating customers without arbitrary discrimination. It may apply criteria established in advance, such as affiliation with the Confindustria network or similar criteria, when selecting customers or assessing offers. Giving preference on this basis does not constitute discrimination.

Customer Contracts and Communications

Contracts and communications with customers must comply with applicable rules, avoid evasive or otherwise unfair practices, and include all information relevant to the customer's decision.

Personnel Conduct with Customers

At every level, Personnel must deal with customers helpfully, respectfully and courteously, working with them in a spirit of cooperation and maintaining high professional standards.

Personal Data Protection

The *Company* respects the confidentiality and personal data of its customers in accordance with applicable law. It also honours customers' instructions on the use of their personal data where provided for under applicable rules.

Supplier Relations

Supplier Selection

The *Company*'s first priority in procurement is to support the local community. It also seeks the best outcome for the *Company*, gives suppliers equal opportunities and acts fairly and impartially. The *Company* selects suppliers and sets purchasing terms by objectively assessing the quality and price of goods or services as well as assurances about support and timeliness, subject to any preferential criteria established in advance.

Integrity and Independence in Supplier Relations

The *Company* continually monitors its relationships with suppliers, including those involving financial and consultancy agreements. Documents exchanged with suppliers must be properly filed. Accounting and tax records, in particular, must be retained for the periods required by law.

Ethical Procurement

To bring procurement into line with its ethical principles, the *Company* may set social requirements for particular purchases where it considers this necessary.

Dominant Market Position

The *Company* undertakes to refrain from abusing any dominant position outside the bounds of ordinary commercial dealings.

Personal Data Protection

The *Company* also protects suppliers' personal data and uses it only within the limits of applicable law.

Selecting Business Partners

The Company selects business partners on the basis of cost-effectiveness and organisational considerations, without discrimination on grounds of sex, race, or political, trade union or religious views.

Contractual Arrangements

The *Company* deals fairly and provides accurate information before and during the contractual relationship, in accordance with applicable rules. It may request information and guarantees needed to put the arrangement into effect. It also requires partners to provide accurate information about their personal and financial circumstances. The *Company* provides information and details on proposed contract terms.

Conduct of the Parties

Throughout the relationship, the parties must act fairly and in good faith, avoid conduct that could harm the relationship, and disclose any circumstances that could affect its continuation.

Privacy and Confidentiality

The parties must keep confidential any information they obtain in the course of the relationship. Personal data must be processed in accordance with applicable law.

Business Relationships

The *Company* applies the principles above to its business dealings and partnerships, including international relationships. This *Code* applies wherever the *Company* operates, even where local laws or regulations do not require the conduct it sets out. All applicable local laws and regulations must also be understood and followed.

Relations with the *Company*'s Equity Holders

Transparent Accounting

To ensure transparent and complete accounting, supporting documents for transactions and events recorded in the accounts must be clear, complete, accurate and truthful. They must be kept on file for review if needed.

Protecting Company Assets

Available resources must be used in accordance with applicable law, the *Company*'s governing documents and this *Code* to build and strengthen its assets and protect the interests of the *Company*, its equity holders, its creditors and the market.

To safeguard the Company's capital, unless expressly permitted by law, the Company must refrain from returning capital contributions in any form, releasing partners from their obligation to make them, or distributing profits that have not actually been earned or that the law requires it to hold in reserve.

Dealings with Public Authorities

Fairness and Good Faith

The *Company* seeks to deal with public authorities with the utmost transparency and integrity. Dealings must comply with applicable law and be conducted fairly and in good faith to safeguard the integrity of both parties. *Personnel* must avoid any conduct that could compromise a public authority's impartiality or independent judgement.

Particular care must be taken in any tender procedures and in matters involving contracts, authorisations, concessions, licences or applications for public funding from national or EU sources.

If the *Company* needs to engage public-sector employees as professional advisers, it must comply with applicable law.

Gifts and Benefits

No one acting for the *Company* may give money or offer financial or other benefits to anyone at a public authority to secure assignments or other advantages for themselves or the *Company*.

Gifts are prohibited if they could be seen as exceeding normal business practice or courtesy, or as intended to secure favourable treatment in any activity connected with the *Company*. In particular, no gift may be offered to a public official or a member of their family if it could influence independent judgement to secure favourable treatment, improper services or any other advantage. The same rule applies to gifts offered through third parties. For at least two years after a deal is concluded or the *Company* submits a request, the *Company* will refrain from hiring or engaging as advisers former public-sector employees who personally and actively took part in the negotiations or helped endorse the *Company*'s request to the public authority. The same restriction applies to their relatives.

Any gifts offered must be properly documented so that the relevant manager or designated contacts can review and authorise them. Copies of relevant documents, such as delivery notes, must be retained.

Anyone at the *Company* who receives an explicit or implicit request for a benefit from someone at a public authority must immediately inform their line manager or the person to whom they report so that

appropriate action can be taken. This requirement does not apply to customary business gifts of modest value.

Initiatives Involving Public Authorities

Where it considers it appropriate, the *Company* may support programmes run by public bodies for the benefit of the community, as well as activities run by foundations and associations, in accordance with applicable rules and the principles of this *Code*.

Community Relations

Financial Dealings with Political Parties, Trade Unions and Associations

The *Company* does not fund political parties, their representatives or candidates in Italy or abroad. It does not sponsor conferences or celebrations held solely to promote political views. The *Company* will not yield to direct or indirect pressure from political figures. For example, it does not accept their recruitment referrals or enter into consultancy agreements for similar purposes. The *Company* does not make contributions to organisations with which a conflict of interest could arise, such as trade unions. It may, however, cooperate with such organisations on specific projects, including by providing financial support, under the following conditions:

- the purpose for which the resources are allocated is clear and documented
- the relevant *Company* functions expressly authorise the arrangement.

Contributions and Sponsorship

The *Company* may contribute only in response to proposals from bodies or associations that expressly operate on a non-profit basis with duly established governing documents and articles of association. Proposals must have significant cultural or charitable value or involve a large number of people. The *Company* may sponsor initiatives in areas such as social welfare, the environment, sport, entertainment and the arts. It sponsors only events that can demonstrate their quality or that the *Company* can help design to

ensure they are original and effective. When choosing which proposals to support, the *Company* pays particular attention to potential personal or business conflicts of interest, such as family relationships with the parties involved or links to organisations whose functions could benefit the *Company*.

Disclosure of Information

External Communications

In communicating with its Stakeholders, the *Company* respects their right to information. False or misleading information or comments must never be circulated.

All communications must comply with applicable laws, rules and standards of professional conduct and must be clear, transparent and timely.

Any attempt to exert pressure on the media or to secure favourable treatment from them is prohibited.

To ensure that information is complete and consistent, only designated functions may deal with the media on the *Company*'s behalf.

Control of Confidential Information

Particular care must be taken when disclosing documents, data or information on non-public *Company* matters that could affect its activities if made public. Disclosure requires prior authorisation from the directors or other designated individuals.

Anyone handling information must avoid any conduct that could lead to a loss of Company assets or confer an improper advantage on themselves or a third party.

Implementing the *Code*

Distribution and Communication

The *Company* is committed to making the *Code* widely available through all channels and opportunities at its disposal, including its

website, dedicated communications in electronic or other formats, briefing sessions and *Personnel* training.
Everyone to whom the *Code* applies must be able to access it, understand its contents and comply with its requirements.

Monitoring Compliance with the *Code*

All *Company Personnel* are responsible for checking that the *Code* is implemented and followed. This responsibility rests in particular with:

- the *Company*'s partners
- the employer
- managers and supervisors.

Reporting Concerns or Suspected Breaches

Anyone who becomes aware of, or reasonably believes there has been, a breach of this *Code*, a law or a Company procedure must immediately inform their manager or designated contact.
Reports must be made in writing and identify the person making them. The *Company* takes the steps necessary to protect anyone who reports a concern from retaliation. The *Company* keeps their identity confidential, subject to legal obligations.
The designated management body is responsible for investigating possible breaches of the *Code*. It may speak to the person who made the report and the person alleged to have committed the breach. *Personnel* must cooperate fully with any internal investigation.
Following the investigation, any conduct that warrants disciplinary action or the exercise of contractual remedies will be referred to the appropriate function.

Operating Procedures and Decision-Making Protocols

To prevent breaches of applicable rules and this *Code*, the *Company* has established specific procedures for everyone involved in its operations. These procedures identify who is responsible for making decisions, giving authorisation and carrying out each operation. At each stage, the work must be carried out by people whose responsibilities are clearly defined and known throughout the organisation.

Disciplinary Measures for Breaches

This *Code* forms an integral part of the contractual obligations of *Personnel* and of anyone with a business relationship with the *Company*. A breach of its principles or standards of conduct undermines the relationship of trust between the *Company* and those responsible, whether they are directors, employees, advisers, contractors, customers or suppliers. A breach may lead to various sanctions.

Employees

An employee's failure to comply with the standards of conduct in this *Code* constitutes a breach of their employment obligations and will result in disciplinary action.
Disciplinary sanctions will be imposed in accordance with the law and the applicable National Collective Labour Agreement. They will reflect the circumstances of each case and be proportionate to the seriousness of the breach. The designated Company functions are responsible for establishing whether a breach has occurred, managing disciplinary proceedings and imposing sanctions.

Contractors, Advisers and Other Third Parties

A serious breach of this *Code* by a contractor, adviser or other third party with a non-employment contractual relationship with the *Company* may result in termination of the contract. If the conduct causes the *Company* loss, the *Company* may also seek damages whether or not the contract is terminated.

Final Provisions

This *Code* is approved by the *Company*'s employer and will be updated as appropriate. The employer must approve any amendments or additions, which must be communicated promptly to those concerned.